

All Cases: Debtor(s) Shirley J. Nailer-Brewer Case No. 19-17390 Chapter 13  
All Cases: Name of Moving Creditor SPECIALIZED LOAN SERVICING, LLC SERVICER FOR  
DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR FFMLT TRUST 2005-FF2,  
MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2005-FF2, its Successors and/or Assigns  
Date Case Filed 6/19/19

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) \_\_\_\_\_

Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ or Date Plan Confirmed 9/4/19

Chapter 7: ☐ No-Asset Report Filed on \_\_\_\_\_  
☐ No-Asset Report not Filed, Date of Creditors Meeting \_\_\_\_\_

1. Collateral
  - a. ☒ Home 6411 South Campbell Avenue, Chicago, Illinois 60629
  - b. ☐ Car Year, Make and Model \_\_\_\_\_
  - c. ☐ Other \_\_\_\_\_
2. Balance Owed as of Petition Date \$65,710.97 as of 9/29/19  
Total of all other Liens against Collateral \$1,725.00
3. In Chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral \$81,000.00 per Schedule A/B
5. Default
  - a. ☐ Pre-Petition Default  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_
  - b. ☒ Post-Petition Default
    - i. ☒ On direct payments to the moving creditor  
Number of months 3 as of 9/29/19 Amount \$1,359.00
    - ii. ☐ On payments to the Standing Chapter 13 Trustee  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_
6. Other Allegations
  - a. ☐ Lack of Adequate Protection § 362 (d)(1)
    - i. ☐ No insurance
    - ii. ☐ Taxes unpaid Amount \$ \_\_\_\_\_
    - iii. ☐ Rapidly depreciating asset \_\_\_\_\_
    - iv. ☐ Other \_\_\_\_\_
  - b. ☐ No Equity and not Necessary for an Effective Reorganization § 362 (d)(2)
  - c. ☐ Other "Cause" § 362 (d)(1)
    - i. ☐ Bad Faith (describe) \_\_\_\_\_
    - ii. ☐ Multiple filings \_\_\_\_\_
    - iii. ☐ Other (describe) \_\_\_\_\_
  - d. Debtor's Statement of Intention regarding the Collateral
    - i. Reaffirm
    - ii. Redeem
    - iii. Surrender
    - iv. ☐ No Statement of Intention Filed

Date: 10/9/19

/s/ Terri M. Long  
Counsel for Movant